

Amendments to the Drawings

References numerals of FIGS. 7 and 8 are renumbered to be different from previously used reference numerals.

Attachment: Annotated Sheets
Replacement Sheets

REMARKS

Claims 1-16 are pending in the Application. Claims 1-3 and 11-16 are amended. Support for the amendments may be found on at least on page 27, line 12 - page 20, line 17 of the Specification as originally filed. No new matter is added by way of this Amendment.

Regarding the specification objections.

Applicants' amended Abstract should now overcome the objection. Applicants respectfully request the objection be withdrawn.

Regarding the drawing objections.

The drawings were objected to in section 4 of the Office Action. Applicants' amended Specification (see the above "Amendment to the Specification") now should overcome these objections. No new matter is added by way of these amendments. Applicants respectfully request the objection be withdrawn.

The drawings were objected to in section 5 of the Office Action as they contained reference characters not mentioned in the description. Applicants' amended Drawings now renumber reference numerals (see the above "Amendment to the Drawings"), now should overcome these objections. No new matter is added by way of these amendments. Applicants respectfully request the objection be withdrawn.

The drawings were objected to in section 6 of the Office Action as they contained reference characters not contained in the written description. Applicants' amended Specification (see the above "Amendment to the Specification") overcomes these objections. No new matter is added by way of these amendments. Applicants respectfully request the objection be withdrawn.

Regarding claim rejections under 35 U.S.C. 102(e).

Claims 1-16 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent ,199,136, hereinafter, “Shtyen.” Applicants respectfully disagree.

Applicants’ amended claim 1 recites, in pertinent part:

a network device detecting a change in a configuration of the network device and transferring information regarding the configuration change;

a remote server receiving the information regarding the configuration change and in response to the information received, searching a database for content (i) corresponding to the configuration change and (ii) supporting the configuration change to the network device, by comparing the information received to content stored in the database;

where the underlined text indicates elements added by way of amendment.

Briefly, Applicants’ invention as recited in claim 1 provides a system by which a network device notifies a server of a change to the hardware configuration on the network device and, in return, the network device receives appropriate drivers to support the new hardware configuration. Specification, page 27, lines 12-16. For example, as illustrated in FIG. 7, the installation of a peripheral device on a network device for which a driver is required triggers dynamic installation of the driver. Specification, page 27, line 17 - page 28, line 17. In the context of a plug and play peripheral device, the claimed system sends a plug and play string intercepted from a peripheral device when the peripheral device (such as a joy stick) is attached to a port (such as a serial port or universal serial bus (USB) port). *Id.* The claimed system receives the sent plug and play string and in response, searches for a matching driver in a data store. *Id.* The claimed system sends a message providing a location of the matching driver in the data store. *Id.* The claimed system then requests the matching driver be downloaded from the provided location. *Id.* In response to the request, the claimed system downloads the matching driver for installation. *Id.* As such, Applicants’ claimed system recited in claim 1, handles situations where a user changes the hardware configuration of a network device to expand the capabilities of the network device. Specification, page 27, lines 12-16.

Shtyen does not teach each and every element of Applicants' Claim 1.

In stark contrast, Shtyen merely describes an application of a FAV ("remote server") that issues requests to a BAV device ("network device") through an abstract representation of the BAV device. *See* Shtyen, column 7, lines 51 – 53. Applicants respectfully submit that the Shtyen's application communicating with a device through an abstract representation of the device is not the same as Applicants' "network device detecting a change in a configuration of the network device and transferring information regarding the configuration change," and "remote server receiving the information regarding the configuration change and....searching a database for content (i) corresponding to the configuration change and (ii) supporting the configuration change to the network device....," recited in now amended claim 1. (Emphasis added).

Moreover, Shtyen merely describes the BAV device ("network device") uploading the abstract representation of the BAV device into the FAV ("remote server") enabling the BAV device and an application of the FAV to communicate through the uploaded abstract representation of the BAV device. *See* Shtyen column 7, lines 51-59 (FAV accepts from a BAV device an uploaded abstract representation of the BAV device that gets registered with FAV. An application of the FAV interacts with the uploaded abstract representation of the BAV device uploaded by the BAV device for control of the BAV device. The application of the FAV issues requests to, and receives calls from, the BAV device through the uploaded abstract representation of the BAV device uploaded by the BAV device). Applicants respectfully submit that Shtyen's BAV device ("network device") uploading an abstract representation of the BAV device into a FAV ("remote server") so that an application of the FAV may communicate with the BAV device through the uploaded abstract representation of the BAV device is not the same as Applicants' "network device requesting download of the content at the location identified in the message," recited in now amended claim 1. (Emphasis added.)

In further contrast, Shtyen merely describes the FAV ("remote server") having a Registry software element for registering software elements so that such software elements registered with the FAV may search for other software elements also registered with the FAV. *See* Shtyen column 2, line 58 - column 3, line 39; and column 7, lines 30-40 (FAV comprises a Registry software element which: (i) inventories devices registered with FAV; (ii) registers

software elements; (iii) maintains for each registered software element an identifier and attributes; and (iv) provides a query interface used by software elements to search for a target software element). Applicants respectfully submit that Shtyen's Registry software element for registering software elements so that registered software elements may be searched for is not the same as Applicants' "remote server receiving the information regarding the configuration change and in response to the information received, searching a database for content (i) corresponding to the configuration change and (ii) supporting the configuration change to the network device," let alone Applicants' "searching..., by comparing the information received to content stored in the database," recited in now amended claim 1. (Emphasis added.) Shtyen's description of a searchable registered software element fails to teach Applicants' recited manner of searching.

Shtyen actually teaches way from Applicants' invention.

Because Shtyen extols the advantages of controlling abstraction representations of devices, which hide the idiosyncrasies of actual devices, over controlling the devices themselves, Applicants respectfully submit that Shtyen actually teaches away or, at least, does not suggest the features recited in now amended claim 1. *See* Shtyen, column 1, lines 57 – 67 (Abstract representations which are operated upon, hide the idiosyncrasies of real devices, providing a uniform interface for higher levels of software and exposing services for building portable, distributed applications on a network).

Accordingly, Applicants respectfully submit that Shtyen neither teaches nor suggests Applicants' claim 1. Applicants believe claim 1 as now amended overcomes the 35 U.S.C. § 102(e) rejection and respectfully request that claim 1 be allowed. Claims 1, 11, and 14 recite similar elements, and as such, should be allowed for similar reasons.

Claims 2-10 depend from claim 1; claims 12-13 depend from claim 11; and claims 15-136 depend from claim 14, as such, the claims should be allowed for the same reasons as the claims from which they depend.

Shtyen does not teach each and every element of Applicants' Claim 2.

Applicants' amended claim 2 recites "The system of claim 1 wherein the configuration change of the network device is an addition of hardware associated with the network device," where the underlined text indicates elements added by way of amendment.

In contrast, Shtyen merely describes a device ("network device") discovering the capabilities of other devices, which are self-described by the other devices. *See* Shtyen, column 3, lines 50 – 57 (A device advertising its capabilities to other devices using self describing data). Applicants' respectfully submit that Shtyen's device itself describing its services to other devices is not the same as Applicants' "configuration change of the network device is an addition of hardware associated with the network device," recited in Applicant's claim 2. Accordingly, Applicants respectfully submit that Applicants' claim 2 is not taught by Shtyen and overcomes the 35 U.S.C. § 102(e) rejection. Applicants' respectfully request that claim 2 be allowed.

Applicants' claims 2, 12, and 15 recite similar elements, and as such, should be allowed for similar reasons.

Shtyen does not teach each and every element of Applicants' Claim 3.

Applicants' amended claim 3 recites "The system of claim 2 wherein the content is a driver, application program, configuration file, registry data or promotion associated with the additional hardware and which corresponds to the configuration change," where the underlined text indicates elements added by way of amendment.

In contrast, Shtyen merely describes generic control messages and default event messages for basic inter-device communication. *See* Shtyen, column 3, lines 41 – 50 (General need to allow existing devices to communicate at a basic level of functionality is addressed using generic control messages and event messages reasonably expected from a device). Applicants' respectfully submit that Shtyen's messages for basic inter-device communication is not the same as Applicants' "content is a driver, application program, configuration file, registry data or promotion associated with the additional hardware and which corresponds to the configuration change," recited in Applicant's amended claim 3. (Emphasis added.) Accordingly, Applicants respectfully submit that Applicants' claim 3 is not taught by Shtyen and overcomes the 35 U.S.C. § 102(e) rejection. Applicants' respectfully request that claim 3 be allowed.

Applicants' claims 3, 13, and 16 recite similar elements, and as such, should be allowed for similar reasons.

CONCLUSION

In view of the above amendments and remarks, it is believed that all claims (claims 1-16) are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

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Annotated Sheet

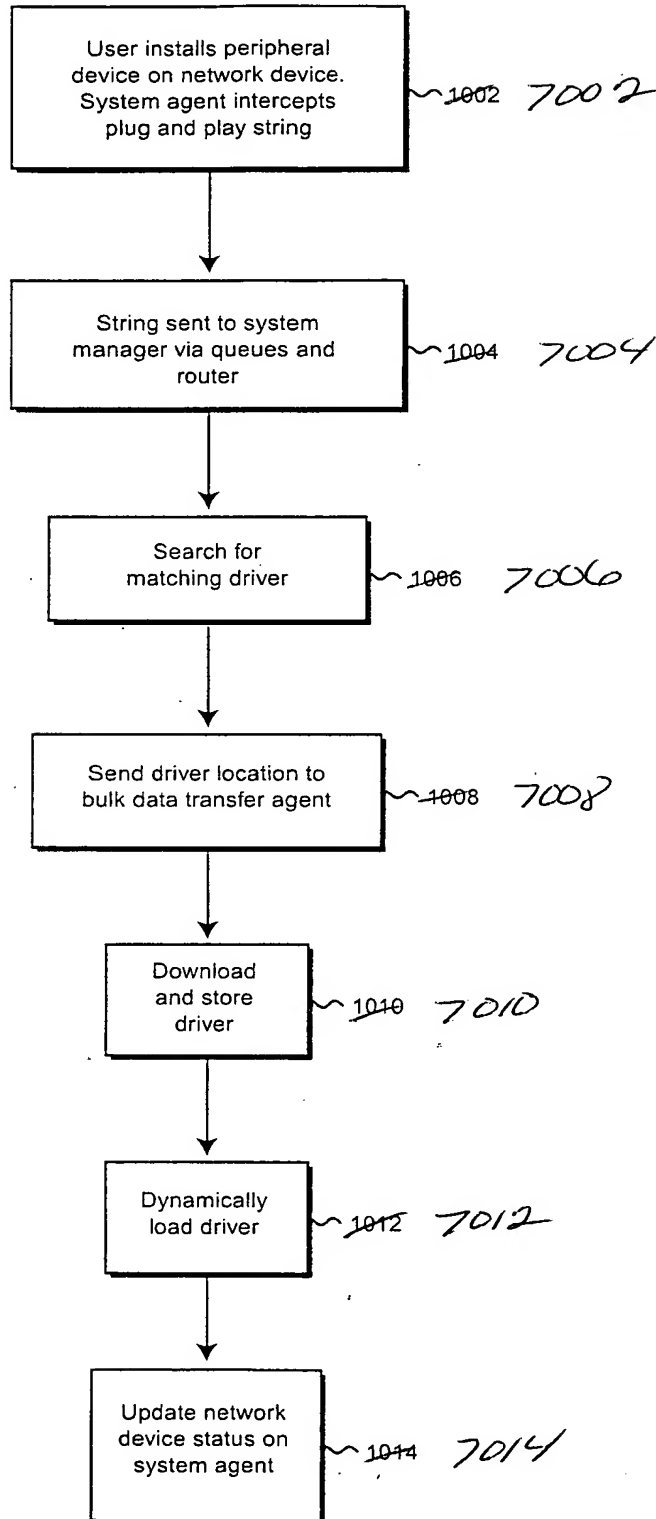


Fig. 7

Annotated Sheet

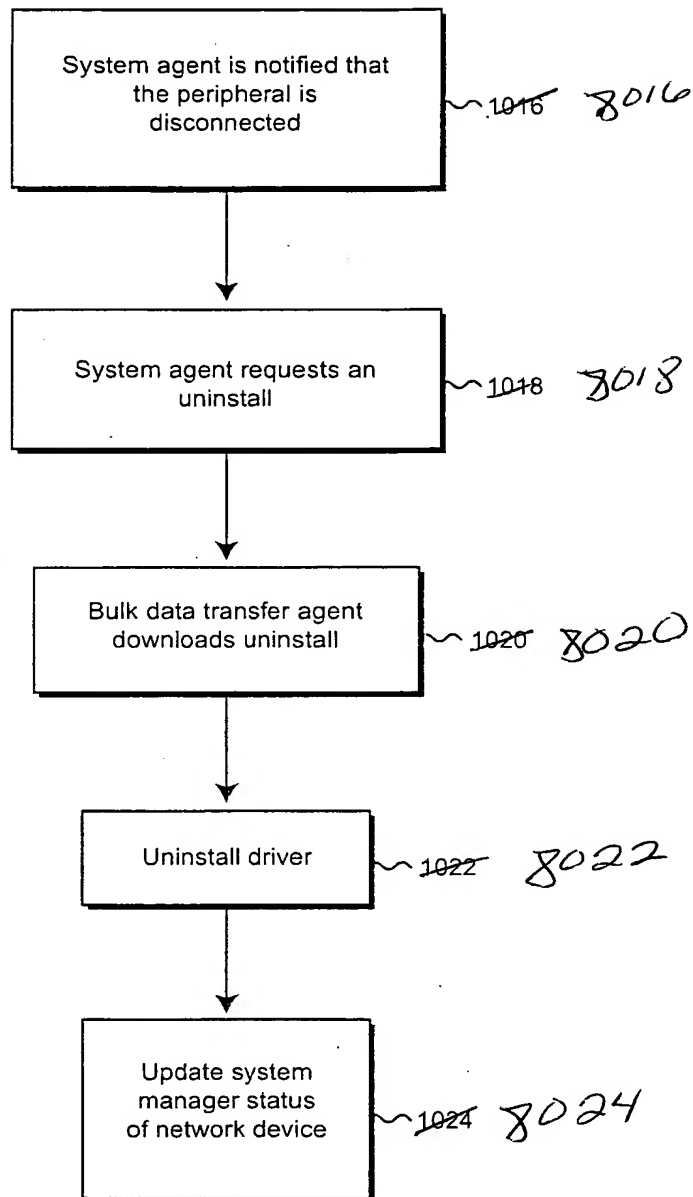


Fig. 8